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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

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Pursuant to L.R. 3-4(a), additional parties are
listed on the signature page.

IN RE ZOOM VIDEO
COMMUNICATIONS, INC. PRIVACY
LITIGATION

Master File No. 5:20-cv-02155-LHK

**JOINT STIPULATION AND [PROPOSED]
ORDER TO ALLOW PLAINTIFFS TO FILE
A FIRST AMENDED CONSOLIDATED
CLASS ACTION COMPLAINT**

Judge: Hon. Lucy H. Koh
Courtroom: 8

**JOINT STIPULATION AND [PROPOSED] ORDER TO ALLOW PLAINTIFFS TO FILE A FIRST
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT
5:20-CV-02155-LHK**

**STIPULATION AND [PROPOSED] ORDER TO ALLOW PLAINTIFFS TO FILE A FIRST
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

WHEREAS, on May, 28, 2020, the Court granted a stipulation of the parties consolidating certain related actions under Federal Rule of Civil Procedure 42(a), setting a deadline for plaintiffs to file a consolidated complaint superseding all previously individually filed complaints no later than thirty (30) days following entry of an order appointing interim class counsel, and setting a deadline for defendants to answer, move or otherwise respond to the consolidated complaint no later than forty-five (45) days following service of the consolidated complaint [Dkt. No. 62];

WHEREAS, on June 30, 2020, the Court entered an order appointing Interim Co-Lead Counsel and Plaintiffs' Steering Committee [Dkt. No. 92];

WHEREAS, on July 30, 2020, Plaintiffs Saint Paulus Lutheran Church, Heddi N. Cundle, Lisa T. Johnston, Therese Jimenez, M.F., Kristen Hartmann, Isabelle Gmerek, Oak Life Church, Stacey Simins, Caitlin Brice, and Cynthia Gormezano (collectively, "Plaintiffs"), filed their Consolidated Amended Class Action Complaint against Defendant Zoom Video Communications [Dkt. No. 114] ("Consolidated Amended Complaint," which was the original Consolidated Class Action Complaint and erroneously named "Amended");

WHEREAS, on September 14, 2020, Zoom filed its Notice of Motion and Motion to Dismiss the Consolidated Amended Complaint ("Motion to Dismiss") [Dkt. No. 120];

WHEREAS, Plaintiffs' deadline to respond to the Motion to Dismiss is October 14, 2020;

WHEREAS, the Motion to Dismiss is currently set for hearing on February 4, 2021;

WHEREAS, Plaintiffs and Zoom have met and conferred regarding issues related to the Motion to Dismiss, and have agreed that in order to focus the legal issues presented to the Court, and thereby conserve the parties' and judicial resources, the best course is to allow Plaintiffs to file a First Amended Consolidated Class Action Complaint on or before October 28, 2020;

NOW THEREFORE, Plaintiffs and Zoom through their respective counsel pursuant to Federal Rule of Civil Procedure 15(a)(2), and subject to the Court's approval, hereby stipulate that:

1. Zoom's Motion to Dismiss is withdrawn without prejudice to Zoom to refile;
2. Plaintiffs are allowed to file the First Amended Consolidated Class Action Complaint on or before October 28, 2020;
3. Zoom will answer, move or otherwise respond to the First Amended Consolidated Class Action Complaint no later than December 2, 2020;
4. Plaintiffs will oppose any motion filed by Zoom in response to the First Consolidated Amended Class Action Complaint no later than December 30, 2020;
5. Zoom will file any reply in further support of any motion filed in response to the First Amended Consolidated Class Action Complaint no later than January 21, 2021;
6. Hearing for any motion filed in response to the First Amended Consolidated Class Action Complaint is set for February 4, 2021.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: October 14, 2020

AHDOOT & WOLFSON, PC

By: /s/ Tina Wolfson

Tina Wolfson

Dated: October 14, 2020

**COTCHETT, PITRE & MCCARTHY
LLP**

By: /s/ Mark C. Molumphy

Mark C. Molumphy

Interim Co-Lead Class Counsel

Dated: October 14, 2020

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By: /s/ Michael G. Rhodes

Michael G. Rhodes (116127)

Attorneys for Defendant

ZOOM VIDEO COMMUNICATIONS, INC.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____

Hon. Lucy H. Koh
United States District Judge

FILER ATTESTATION

I, Christopher E. Stiner, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Michael G. Rhodes, Mark C. Molumphy, and Tina Wolfson has concurred in this filing.

DATED: October 14, 2020

/s/ Christopher E. Stiner

Christopher E. Stiner